

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Amendment of the Commission's Rules)	ET Docket No. 01-278
to Permit Broader Data Transmission)	RM-9375
Capabilities)	RM-10051
)	

COMMENTS OF

VYTEK Solutions, Inc., fully supports the Savi Technology request for amendment of the Commission Rules to permit broader data transmission capabilities for unlicensed Part 15 devices. This initiative will benefit all tracking applications within the supply chain and improve business process. The proposed Savi system would allow the location of any item that has an associated Savi tag to be interrogated, located and identified at the ports and warehouse facilities in the transportation chain, greatly simplifying the shipping and tracking process.

The current Savi product certainly is a step in the right direction of more efficient shipping tracking. However, in some applications greater amounts of data on the tags are needed and a capability for accessing this data through RFID communication will optimize the current system. Increasing the Part 15 duty factor, while maintaining the same field intensity of the existing system, increases the utility of the Savi system while maintaining the same operating range. This allows the full capability of the system to be used to provide complete visibility of the container location and contents of the containers when required.

The expanded capability afforded by use of a longer duty cycle increases the efficiency and speed in handling the material transported in the commercial supply chains throughout the

world. This in turn has the potential of increasing our throughput at our U.S ports and allow the full use of existing port and warehouse facilities without the need for costly expansions. The faster, better and more cost effective service that we will be able to offer using the full capabilities of a Savi RFID system will benefit the U.S. consumer through lower transportation costs.

VYTEK Solutions, Inc., fully supports favorable consideration of the Savi petition to the FCC for increased duty cycle capabilities without reduction in the 100 meter operating range of the current system.

Respectfully submitted,

Matthew J. Lombardi, President

February 12, 2002